

Dacorum Local Plan to 2041 Pre-Submission Version November 2024 - DEF Response

The following text is divided into sections, divided by lines of asterisks, according to the Plan's Paragraph and/or Policy numbers referred to, as required by the Representation Form. It will be entered on line using copy and paste. Each section follows the format:

1. Quotes from the Plan (black)
2. Quotes from the 2019 National Planning Policy Framework, in each case introduced by a paragraph explaining why that version is used. (blue)
3. DEF response, generally pointing out discrepancies between 1. and 2. (green)
4. DEF suggestions for amending the Plan (these go in a separate box on the Representation Form.) (also green)

1.35 In March 2019, Hemel Hempstead was awarded a new "Garden Town" status. The Hemel Garden Communities (HGC) programme was created with the aim to deliver transformational change for the town. The programme provides a strategy for Hemel Hempstead with locations for development split across two administrative areas, our own and St Albans City and District Council (SADC).

1.36 Overall, the project proposes a highly sustainable urban expansion to the east and north of Hemel Hempstead. The proposals will bring around 11,000 new homes in total. It is also proposed to deliver new jobs and a range of other facilities including green spaces, shops, schools, community facilities, healthcare and improved walking, cycle and public transport routes. It is expected that these will be delivered by 2050.

1.37 The HGC programme and aspirations for growth in the Local Plan period to 2041 and beyond is closely aligned with the Spatial Strategy for the Local Plan - through a mixture of regeneration opportunities and urban extensions to the town. The strategy aims to revitalise the town centre, reinvigorate Two Waters through celebrating its industrial past, protect the most important employment areas to ensure they remain fit for the future, and deliver new balanced communities.

1.38 The Spatial Strategy requires Hemel Hempstead to accommodate the majority of growth for the Borough (c.70%), and significantly more than any of the other settlements. For this reason, Chapter 2 - Delivering Growth at Hemel Hempstead is needed to focus in more detail on the policy requirements necessary to unlock planned growth and support the delivery of the wider Hemel Garden Communities vision for the town.

The plan does not conform to the National Planning Policy Framework. We have been advised that the December 2023 version of the NPPF will apply to the examination of the Dacorum Reg. 19 draft. Our submission therefore refers to paragraphs from that version of NPPF and says why the Reg. 19 draft departs from NPPF and should be amended. However it is possible that the Inspector will want to take into account the draft changes to NPPF of the new government so we shall refer to them also in places.

Quotes from NPPF Para 74, 129 and 143

74. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, provided they are well located .., and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, authorities should identify suitable locations for such development

129. Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities.

a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;

b) the use of minimum density standards should also be considered for other parts of the plan area.

143: Green Belt serves five purposes: (including)

a) to check the unrestricted sprawl of large built-up areas;

c) to assist in safeguarding the countryside from encroachment;

It cannot be claimed that the Spatial Vision of Hemel Garden Communities was drawn up "working with the support of communities" It has never been the subject of a public consultation. There is no acknowledgement in the plan of the strong opposition to the said Vision that is presented in Appendix 2e of the Responses to Emerging Strategy 2020 Consultation.

The Government designation of Hemel Hempstead as a Garden Town did not specify or authorise Green Belt loss. That emerged in the Hemel Garden Communities Spatial Vision. The current NLP has been driven by the Hemel Garden Communities Spatial Vision, is shot through with advocacy for it, and treats its assumptions as a fait accompli. This despite the fact that unlike Local Plans, the Spatial Vision has never been the subject of public consultation, although the Spatial Vision document confidently states that the end result will be as it has pre-determined, saying "These proposals include a range of sites, some of which have been allocated in the adopted Local Plan whilst others will be allocated in emerging or future Local Plans or are simply windfall."

When James Doe, DBC Assistant Director – Planning, Development and Regeneration, Dacorum Borough Council, presented on the Spatial Vision of Hemel Garden Communities to the Dacorum Environmental Forum on May 9th 2019 considerable concerns were expressed over the scale of the project, the loss of Green Belt and the absence of public consultation.

The Spatial Vision for Hemel Garden Communities is particularly land-hungry. The report to DBC's Cabinet on Oct. 17th 2023 Para 2.27 et seq. shows how the Green Belt land take figure might be reduced further by counting land within HGC as Green Belt. To do so would be a travesty of the purposes of the Green Belt set out in Para. 143 of the NPPF. The lower housing density and green surroundings in the North Hemel proposed site will mean a higher house price tag, and therefore contribute nothing toward any targets for providing affordable homes. Para. 129 quoted above should be observed, taking into account that the plan claims that North Hemel would be "well served by public transport".

The Spatial Vision flies in the face, not only of repeatedly expressed public opinion, but of the planning policies and the assessments of professional planners that have emanated from DBC over recent decades. These were summarised in DEF's response to the 2021 consultation on the Emerging Strategy for Growth and in our response to this plan under Hm01 - North Hemel Hempstead Growth Area. The current consultation makes no attempt to explain the differences

from past assessments. The value of the landscape has not changed - only the housing demand figures.

Suggested Change:

1.35 In March 2019, Hemel Hempstead was awarded a new "Garden Town" status. However the designation of Hemel Hempstead as a Garden Town did not specify or authorise Green Belt loss. That emerged in the Hemel Garden Communities Spatial Vision, and this plan does not adhere to the HGC Spatial Vision where it contradicts the National Planning Policy Framework.

(etc. to make other paragraphs consistent with this.)

1.64 Before concluding that exceptional circumstances exist to justify making changes to the Green Belt, the NPPF requires us to demonstrate that we have fully examined all other reasonable options for meeting our identified need for development (Paragraph 146). The Council is satisfied that the spatial strategy:

- a. makes as much use as possible of suitable brownfield sites and underutilised land;
- b. optimises the density of development in line with the policies in chapter 11 of the NPPF; and
- c. has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.

1.65 The strategy cannot deliver the level of homes (including affordable homes), jobs and infrastructure required within existing settlement boundaries. Furthermore, restricting the expansion of the towns and larger villages will only worsen affordability in these areas, with no viable spare land available for new school provision, employment opportunities or delivering infrastructure. The Council has explored all reasonable options and in order to deliver the vision and strategic objectives of the Local Plan, exceptional circumstances exist to amend the Green Belt boundary.

The plan does not conform to the National Planning Policy Framework. We have been advised that the December 2023 version of the NPPF will apply to the examination of the Dacorum Reg. 19 draft. Our submission therefore refers to paragraphs from that version of NPPF and says why the Reg. 19 draft departs from NPPF and should be amended. However it is possible that the Inspector will want to take into account the draft changes to NPPF of the new government so we shall refer to them also in places.

Quotes from NPPF Paras. 143 and 180:

143: Green Belt serves five purposes: (including)

- a) to check the unrestricted sprawl of large built-up areas;
- c) to assist in safeguarding the countryside from encroachment;

180: Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes ...

Many of the sites proposed for de-Green-Belting in the Plan, particularly the larger ones such as North Hemel cited in our response to Strategic Policy HGC1, are contrary to these key purposes and neither protect nor enhance valued landscapes. The accompanying Sustainability Appraisal report concludes, under 9.13, "Landscape": "The appraisal in Section 6 flags a significant concern with the preferred growth scenario, but it is not possible to identify a better performing alternative." and under 9.17.1: "Landscape – it is considered appropriate to upgrade the conclusion to a 'moderate or

uncertain' negative effect having taken account of detailed site-specific development management policies."

The majority of sites proposed for de-Green Belting do not satisfy the definition of "Grey Belt" according to the recently published version of the NPPF which states:

"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143." Para. 143 has: "Green Belt serves five purposes: (including)

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- d) to preserve the setting and special character of historic towns; "

Account should be taken of the fact that the removal of purpose c) "to assist in safeguarding the countryside from encroachment" occurred between the publication of proposed NPPF changes and its reappearance as "published", so it was not subject to public consultation.

A lower housing growth target would spare the Green Belt, as argued in our response to Strategic Policy SS1 - Spatial Strategy for Growth .

Suggested Change:

1.65 By observing the National Planning Policy Framework in respect of Green Belt protection, and using the latest household formation predictions from the Office for National Statistics the strategy has succeeded in delivering the level of homes (including affordable homes), jobs and infrastructure required within existing settlement boundaries.

(etc. to make other paragraphs consistent with this.)

Strategic Policy SS1 - Spatial Strategy for Growth

1. Dacorum's Local Plan will make provision for the following in the period up to 2041:

a. A minimum of 15,332 homes, delivered through a mixture of allocations, windfalls and existing permissions;

2.2 The Hemel Garden Communities Programme Area (figure 1), which is across St Albans District and Dacorum Borough Council (DBC), encompasses the existing town of Hemel Hempstead, Growth Areas and other site allocations set out in Dacorum Borough Council's Local Plan. The HGC Programme Area will support the transformation of Hemel Hempstead.

2.3 The HGC Growth Areas include land to the north and east of Hemel Hempstead within Dacorum Borough and St Albans District, which will provide a network of garden communities.

2.4 The HGC Growth Areas to the north and east of Hemel Hempstead, are expected to extend beyond the Plan period and will deliver up to 11,000 new homes and 10,000 new jobs by 2050 across St Albans District and Dacorum Borough.

2.5 Further site allocations at Hemel Hempstead will deliver around 5,170 homes. These sites include development and transformation proposals within the Opportunity Areas of the town centre, Two Waters. Town-wide transformative infrastructure is also planned to support the growth.

2.6 The transformation will include an extended Maylands Business Park through the delivery of Hertfordshire Innovation Quarter (Herts IQ), which will deliver around 6,000 of the 10,000 jobs, and a regenerated and transformed town centre for Hemel Hempstead and further infrastructure across the rest of the town.

2.7 Within Dacorum, the North Hemel Growth Area will deliver at least 1,500 new homes by 2041 with a further 3,500 by 2050, providing a total of 5,000 homes.

Strategic Policy H1 - Delivering the Housing Strategy

1. The Plan will deliver at least 15,332 net additional homes across the Borough between 2026 and 2041.
2. The new homes will be delivered against an annual supply requirement of 1,016 dwellings per annum.

The plan does not conform to the National Planning Policy Framework. We have been advised that the December 2023 version of the NPPF will apply to the examination of the Dacorum Reg. 19 draft. Our submission therefore refers to paragraphs from that version of NPPF and says why the Reg. 19 draft departs from NPPF and should be amended. However it is possible that the Inspector will want to take into account the draft changes to NPPF of the new government so we shall refer to them also in places.

Quotes from NPPF Paras. 11, 61 and 117:

11. Strategic policies should ... provide for objectively assessed needs for housing ... unless .. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area." Footnote 7 of this paragraph states that this includes "land designated as Green Belt".

31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.

61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area ... There may be exceptional circumstances ... in which case the alternative approach should also reflect current and future demographic trends.

The rate of growth 1016 hpa. far exceeds what is acceptable to the majority of respondees to various public consultations. Over the years there have been consultations on a succession of local plans for Dacorum. When the level of growth was put to public consultation in November 2010 the majority of respondees favoured Option 1 (no Green Belt land take): 370hpa to Option 2: 430hpa but the Council chose the higher figure.

According to the Public reports pack for the DBC Strategic Planning Environment Overview & Scrutiny Committee meeting of Oct. 4th 2023 the level of growth had been merely pared down to 900hpa from the 922 of the 2020 the Draft NLP. In response to the 2021 consultation on this draft there was a considerable body of opposition to this level of growth, driven as it continues to be, by the Spatial Vision of Hemel Garden Communities, but this opposition has clearly not yet been taken on board.

The Overview & Scrutiny pack spelt out the housing demand issue explicitly thus:

"2.15 Context: The community response stated that the Standard Method results in inflated housing targets for the Borough, and that the method did not adequately consider the Borough's constraints such as the Chilterns Area of Outstanding Natural Beauty and Green Belt.

2.16 The Council does not have any evidence at this stage to justify an alternative approach to the standard method figure."

2.16 failed to observe not only the public response, but also the NPPF Paragraph 11 quoted above.

According to The Office for National Statistics, 2018-based Table 406: "Household projections, local authorities and higher administrative areas within England, mid-2001 to mid-2043" (the latest available) household demand in Dacorum will increase from 67025 in 2026 to 71676 in 2041, i.e. it will increase by 310 p.a. . Applying the "Uplift" required under the Government's required Standard Method, which is capped at 40%, increases this to 434 p.a., (6511 over the plan period), significantly less than the 1016 p.a. currently proposed. The current consultation documents do not appear to provide a separate figure for Brownfield capacity over the plan period. However the topic paper on Housing Policy that accompanied the 2020 Draft NLP stated "7.10 Table 7.1 clearly identified that urban land can make a substantial contribution (c.11,000 homes) towards our housing requirement". This would more than cover the sixteen years of the plan period without requiring any loss of Green Belt. Reducing the hpa from the proposed 1016 to 434 would therefore not only comply with NPPF's requirements to protect the Green Belt but also with NPPF Para 31's requirement to use the latest available data.

Suggested Change:

2. The new homes will be delivered against an annual supply requirement of 434 dwellings per annum.

(etc. to make other paragraphs and plans consistent with this.)

Policy NE7 - Protecting and Enhancing the River Character and Water Environment

1. Proposals will be supported where they conserve and enhance biodiversity, by connecting blue and green corridors, improving the river character, water quality and ecological conditions and restoring flows.

Policy CC6 - Protection from Environmental Pollution

6. Development will be expected to protect and improve water quality. This will be achieved by:
a. Improving water quality standards in line with the Water Framework Directive and Environment Agency and Natural England guidance;

The plan does not conform to the National Planning Policy Framework. We have been advised that the December 2023 version of the NPPF will apply to the examination of the Dacorum Reg. 19 draft. Our submission therefore refers to paragraphs from that version of NPPF and says why the Reg. 19 draft departs from NPPF and should be amended. However it is possible that the Inspector will want to take into account the draft changes to NPPF of the new government so we shall refer to them also in places.

Quote from NPPF Para 180:

180. Planning policies and decisions should contribute to and enhance the natural and local environment by: ...

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution ...

As acknowledged in 6.24 of the current version of the plan "Chalk streams are a characteristic and attractive feature of the Chilterns landscape", and Policy NE7 says that proposals will be supported where they conserve and enhance biodiversity. However the location of water supplies for new

developments has not been specified, and if taken from the local aquifers the unique quality of Chalk Streams will be seriously affected.

DBC's publication, "Dacorum Landscape Character Assessment" 2003, was formally adopted by DBC on 5th May 2004, as Supplementary Planning Guidance to the DBC Local Plan. The document identified Area 123, the High Gade Valley, and stated the need to conserve and strengthen the natural features of the valley. It included the guidance "to restrict further development within the valley" and to "resist developments which could lower the water table within the valley".

The UK Government's Environmental Improvement Plan of 2023 clearly identified the international importance of chalk streams, of which the Gade, Bulbourne, and Ver are three.

In Dacorum's 2020 "Emerging Strategy for Growth" Consultation document:

Para. 18.39 highlighted the global rarity of the chalk streams in Dacorum, their relatively poor ecological status and the need to return them to good status.

Para. 18.40 acknowledged that water resources were under extreme pressure from the use of groundwater for water supply and from climate change. The recharge of groundwater was under pressure and this threatened the retention of fragile ecosystems susceptible to the availability and flow of water.

Para. 18.41 promised to restore river flows and natural habitats along the chalk streams, to retain water in the catchment and to support biodiversity.

Policy DM33. (c) was to avoid the need to abstract water from the ground, in particular from the Rivers Ver, Gade and Bulbourne catchments. The policy opened with the statement "The water environment will be managed through development management ... in consultation with the Environment Agency and the Lead Local Flood Authority".

In the Interim Sustainability Appraisal Report Appendix C that accompanied the 2020 Emerging Strategy for Growth, water was considered in relation to the assessments of each of the main development options A to E. The section on the generic effects for all of the options stated, "Any new housing development will put pressure on water resources. The higher the level of housing the greater the potential adverse effects will be". It also referred to the increasing potential for water pollution and sewer floods. At the highest level of development periodic water shortages were likely. The evaluation of the development options appeared to be unable to quantify negative impacts. The section on mitigation of the negative impacts offered some ideas on actions to be taken, but these were not evaluated, and said merely that they would "help to mitigate the potential adverse effects on water quality and the availability of water resources that may arise from new development". This statement clearly recognised that not all detrimental effects would be avoided and that therefore the present poor state of our rivers would get worse.

Four years on, NE7 is the most relevant policy in the current version of the plan, but It contains no real tools to ensure that mitigation policies are achieved. There is no time frame and there is no evaluation of the level of harm expected from the currently proposed housing developments.

Suggested Change:

6. Planning permission will not be granted for any development that will not provably protect and improve water quality.

(etc. to make other paragraphs and plans consistent with this.)

Figure 7 - HGC Programme Area (Source: HGC Delivery statement, 2024)

Figure 8 - Indicative Concept Plan for HGC Growth Areas (Source: HGC Evidence Base 2024)

2.18 The HGC Green Infrastructure Strategy document has been developed to create a greener, more connected and biodiverse place.

2.25 Maintaining Green Belt on the Gade Valley slopes, Piccotts End will retain its distinct and separate identity. An extensive package of landscape mitigation measures, coupled with the delivery of new suitable alternative natural green space, will ensure any impacts on the Chilterns National Landscape will be minimised.

Strategic Policy HGC1 - Transformation of Hemel Hempstead

1. Within Dacorum Borough, the Hemel Garden Communities Programme Area will deliver at least 10,700 new homes by 2041 with a further 3,500 homes to be delivered by 2050. This will be delivered through a network of new neighbourhoods at North Hemel Hempstead Growth Area, Polehanger Lane, and Shendish Manor and through urban regeneration opportunities in the town centre and Two Waters area. Site allocations to support this growth are presented in Chapter 12.

Strategic Policy H1 - Delivering the Housing Strategy

1. The Plan will deliver at least 15,332 net additional homes across the Borough between 2026 and 2041.

Hm01 - North Hemel Hempstead Growth Area (Map)

Size 455.28 hectares comprising 204.02 hectares of land to be retained in the Green Belt 251.26 hectares of land to be released from the Green Belt Timescale from 2032/33

Key development and land use requirements Around 1,500 dwellings by 2041, with up to 3,500 additional homes (to include provision for older people) to be delivered beyond the plan period subject to masterplanning.

Strategic Policy HGC2 - Hemel Garden Communities Place Principles

h. Enhance and improve Public Rights of Way including to existing local footpath links and wider countryside access;

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Quote from NPPF Para. 102:

102. Access to a network of high quality open spaces and opportunities for ... physical activity is important for the health and well-being of communities.... Planning policies should be based on ... assessments of the need for open space.... (including quantitative or qualitative deficits or surpluses)

This site allocation, driven by adherence to the Spatial Vision of Hemel Garden Communities, appeared in the 2020 "Emerging Strategy for Growth" consultation and has been carried forward, with some retrenchment, to the current plan. Even with the said retrenchment the proposed development extends to the skyline that is very visible and dominant over the Upper Gade Valley and from the Chilterns AONB/National Landscape. The departure from previous policies and judgements when it came to the assessments of individual Sites was flagrant and unexplained. The Schedule of Site Appraisals (for large greenfield sites) of October 2017 for the equivalent Site HH-h1b North Hemel Hempstead (Phases 1 and 2) included under the Technical Studies Assessment the categorical statement "Exclude from further assessment and retain as Green Belt.". However the Sustainability Appraisal Report Appendix E.1 of the 2020 "Emerging Strategy for Growth" the assessment tick-list under "Landscape/Townscape", gave it an amber cross meaning "The option is likely to have a negative effect which is not significant", contradicting their own

statement that " The northern boundary of the site is adjacent to the Chilterns AONB and development could affect the setting of the AONB. The site is within the High Gade Valley and Gaddesden Row character areas. Development of the site would extend Hemel Hempstead into this prominent area of countryside and close the gap with Piccotts End".

In the 2020 "Emerging Strategy for Growth" Consultation document TRL, who were commissioned to produce the Sustainability Appraisal Report had found: "The site also includes Varney's Wood wildlife site and is adjacent to Thrift Wood wildlife site, both of which contain ancient woodland, which could be affected by development. In the current version of the plan the development boundary has receded from the 2020 and 2023 versions, and we would oppose any representations in favour of reverting to that boundary. However in the current version the development still abuts Varney's Wood, which is not mentioned in the accompanying Sustainability Appraisal report.

Any developments on Green Field sites North of Hemel Hempstead should be guided by Natural England's recommendations for an extension to the Chilterns AONB (since rebranded as National Landscape, which will probably give it stronger protection). There is also the possibility that the Chilterns may be given National Park status. The current Sustainability Appraisal Report appears not to mention the fact that Natural England is undertaking a review of the AONB/National Landscape boundary and that there is potential for the boundary to extend so that it includes part of the Upper Gade Valley. Also, the Glover Report commissioned by DEFRA in 2019 recommended that the Chilterns AONB/National Landscape should be designated a National Park. Both of these make HGC's Spatial Vision's proposal to build to close proximity to the existing AONB/National Landscape boundary particularly unacceptable.

As regards compliance with NPPF Para. 102, Hm01 would obliterate or totally change the rural character of footpath numbers (GG or HH) 44,47,48,49, 50, 51, 52, 55 and 56. These are currently easily accessible on foot from Grovehill (whose population in 2016 was 8,099) and Woodhall Farm (Population 7,022), way in excess of the proposed number of dwellings in Hm01 by the end of the plan period and realistic levels of occupancy. Existing residents requiring access to the countryside would probably need to use their cars, while those without cars would be deprived of their former access to countryside. There would be a "quantitative or qualitative deficit" in terms of the Plan's Strategic Policy to "Enhance and improve Public Rights of Way including to existing local footpath links and wider countryside access;"

Suggested Change:

Remove Hm01 - North Hemel Hempstead Growth Area from the plan.

(etc. to make other paragraphs and plans consistent with this.)

Policy NE2 - Protecting Biodiversity and Geodiversity

1. Proposals will be expected to protect, maintain and where possible enhance sites that are important for nature conservation, habitats, ecological networks, and geological and geomorphological interest.

The plan does not conform to the National Planning Policy Framework. We have been advised that the December 2023 version of the NPPF will apply to the examination of the Dacorum Reg. 19 draft. Our submission therefore refers to paragraphs from that version of NPPF and says why the Reg. 19 draft departs from NPPF and should be amended. However it is possible that the Inspector will want

to take into account the draft changes to NPPF of the new government so we shall refer to them also in places.

Quotes from NPPF Para. 32 and 124:

Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal... This should demonstrate how the plan has addressed relevant economic, social and environmental objectives.

124. Planning policies and decisions should:

.. encourage multiple benefits from both urban and rural land, including ... taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

Policy NE2 needs to be made more credible. One example of how the plan already fails to meet its stated objective, as stated in our response to Hm01 - North Hemel Hempstead Growth Area, is that the proposed site abuts Varney's Wood wildlife site and ancient woodland which would be severely impacted by the proposed development. Dell Wood and Warners End Wood (because of increased footfall) are ancient woodlands that would similarly be impacted by proposed site Hm13, Polehanger Lane.

NPPF states that the plan should demonstrate how it **has addressed** relevant environmental objectives, not merely kicked them down the road. Without a strengthening of this policy there is considerable doubt concerning the deliverability of ameliorative green measures. Similar aspirations in the past have fallen by the wayside along the way to the approval of Master Plans, and this policy provides no indication that the green aspirations within the current plan will be enforced any more previous ones have been. An example of such failed aspiration was the promise of an adequate Wildlife Corridor as an extension to the Shrubhill Common Local Nature Reserve in order to ameliorate the loss of Green Belt due to the LA3 (West Hemel) development. DBC's 2013 Adopted Core Strategy promised in respect of LA3 to "Extend Shrubhill Common Nature Reserve and create wider green infrastructure links". However during the latest phase of that process, culminating in 2019 in the approval by DBC of the Master Plan for LA3, the number of homes increased from the 900 of the DBC's 2013 Adopted Core Strategy to 1100. That step increase could have been used instead to provide a substantial wildlife corridor along the route of the Chiltern Way, as called for by DEF and Friends of Shrubhill Common, together with advice from the Herts. Biological Records Centre, and would have accorded with guidelines issued by English Nature. Instead, while there are so-called "Green Corridors" in the LA3 Master Plan, their principal purpose is recreational, not nature conservation. The HGC Spatial Vision document cites Shrubhill Common as an exemplar of combining wildlife with play areas and the Chiltern Way, without mentioning LA3 or the fact that that stretch of Chiltern Way will probably be tarmacked and/or lit in consequence of the development.

Suggested Change:

Policy NE2 - Protecting Biodiversity and Geodiversity

1. Planning permission will not be granted for any development that will not provably maintain and enhance sites that are important for nature conservation, habitats, ecological networks, and geological and geomorphological interest.

(etc. to make other paragraphs and plans consistent with this.)

Strategic Policy CC1 - Climate Change Mitigation and Adaptation

2. The policies of the Plan will contribute to net zero carbon through mitigation measures by:

e. Requiring development to have high levels of thermal efficiency, including setting carbon emission targets where applicable;

The plan does not conform to the National Planning Policy Framework. We have been advised that the December 2023 version of the NPPF will apply to the examination of the Dacorum Reg. 19 draft. Our submission therefore refers to paragraphs from that version of NPPF and says why the Reg. 19 draft departs from NPPF and should be amended. However it is possible that the Inspector will want to take into account the draft changes to NPPF of the new government so we shall refer to them also in places.

Quotes from NPPF Para. 159.

New development should be planned for in ways that:

b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

The policy is not as specific as NPPF Para 159 requires. It should specify the standard of thermal insulation to be applied. Very probably by the time this plan is in force and in any case for the majority of the plan period the relevant standard is the Future Homes Standard which is expected to be implemented in 2025.

Suggested Change:

Strategic Policy CC1 - Climate Change Mitigation and Adaptation

2. The policies of the Plan will contribute to net zero carbon through mitigation measures by:

e. Requiring development to have levels of thermal efficiency that conform to the Future Homes Standard and setting carbon emission targets where applicable;